

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

October 14, 2011

**Motion of the National League of Postmasters for Acceptance of
Late Filing of Responses to USPS Interrogatories**

The National League of Postmasters of the United States (the "League") moves for acceptance of the late filing of Witness Strong's responses to the United States Postal Service's Interrogatories, USPS/NLPM RT-1 1 through 54. The USPS filed its interrogatories on October 3, 2011. Pursuant to the Commission's abbreviated schedule, Witness Strong's responses were due within 7 days, or by October 10, 2011 (Order Number 778 at page 4, July 28, 2011.) As the 10th was a holiday, Witness Strong's responses were due the following day, October 11th. Due to the high volume of interrogatory requests (54 with numerous sub-parts) and the press of business, Witness Strong's responses were not able to be filed until late evening on October 11th. The responses to 48(a) and (b) required some additional effort to ensure accuracy, and were not able to be filed until late evening on October 13th. Both filings were served upon the Postal Service as soon as they could be completed. The League regrets the delay, but under the abbreviated schedule believes that any prejudice will be minimal.

Respectfully submitted this 14th day of October, 2011.

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